

THE LAW OFFICES OF MICHAEL M. MULDER
1603 Orrington Avenue, Suite 600
Evanston, Illinois 60201
Telephone: 312-263-0272
Michael M. Mulder*
Elena N. Liveris*
**Pro hac application pending*

*Proposed Counsel to the Official Committee of
Retirees with Life Insurance Benefits of the
Sears Holdings Corporation, et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Case No: 18-23538 (RDD)

SEARS HOLDINGS CORPORATION, *et al.*,

Chapter 11

(Jointly Administered)

Debtors.

**CERTIFICATE OF NO OBJECTION REGARDING APPLICATION OF THE
OFFICIAL COMMITTEE OF RETIREES WITH LIFE INSURANCE
BENEFITS OF THE SEARS HOLDINGS CORPORATION, ET AL. TO
RETAIN AND EMPLOY THE LAW OFFICES OF MICHAEL M. MULDER
AS CO-COUNSEL, *NUNC PRO TUNC* TO JULY 9, 2019**

**TO: THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE**

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), the Official Committee of Retirees With Life Insurance Benefits of Sears Holdings Corporation and its affiliated debtors and debtors in possession, by and through its undersigned counsel hereby certifies as follows:

1. Beginning on October 15, 2018 (the “Commencement Date”) and continuing thereafter, each of Sears Holdings Corporation and its debtor affiliates, as debtors and debtors in

possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code.

2. An official committee of Retirees with Life Insurance Benefits (the “Retirees Committee”) was appointed on July 9, 2019 (ECF 4470).¹

3. On July 30, 2019, the Retirees Committee filed the *Application of the Official Committee of Retirees with Life Insurance Benefits of the Sears Holdings Corporation, et al. to Retain and Employ the Law Offices of Michael M. Mulder as Co-Counsel, Nunc Pro Tunc to July 9, 2019* (ECF 4653) (the “Application”).

4. On August 23, 2019, the chairman of the Retirees Committee, Ronald Olbrysh, and proposed co-counsel, Michael M. Mulder, filed supplemental declarations in support of the Application, at the request of the Office of the United States Trustee (ECF Nos. 4969, 4970) (the “Supplemental Declarations”).

5. The Application established a deadline for certain parties to object to the Application of August 5, 2019 at 4:00 p.m. (Eastern Time) (the “Objection Deadline”). The Amended Order Implementing Certain Notice and Case Management Procedures, entered on November 1, 2018 (ECF 405) (the “Amended Case Management Order”), provides that a motion or application may be granted without a hearing, provided that no objections or other responsive pleadings have been filed after the passage of the Objection Deadline and the attorney for the entity who filed the pleadings complies with the terms of the Amended Case Management Order.

6. The Objection Deadline has passed and, to the best of my knowledge, no objection or request for a hearing with respect to the Application has been (a) filed with the

¹ The Retirees Committee currently comprises: (i) Richard Bruce, (ii) Ronald Olbrysh, (iii) Mary Rose Steininger, (iv) James T. Nally, and (v) Joseph E. Hartzell.

Court on the docket of the above-captioned case or (b) served on proposed co-counsel to the Retirees Committee in accordance with the Amended Case Management Order. To the best of my knowledge, no other responsive pleading has been filed with respect to the Motion.

7. On August 23, 2019, Paul K. Schwartzberg on behalf of the Office of the United States Trustee approved the Application and Supplemental Declarations.

8. The proposed order granting the relief requested in the Application (the "Proposed Order") is annexed hereto as Exhibit A.

9. Accordingly, the Retirees Committee respectfully requests that the Proposed Order granting the relief requested in the Application be entered in accordance with the Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: September 18, 2019
New York, New York

/s/ Michael M. Mulder

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